	age i de la				
1	FRANK J. RAGEN Calif. Bar No. 054378				
2	105 West "F" Street, Suite 215 San Diego, California 92101 Telephone No. (619) 231-4330 Facsimile No. (619) 239-0056 Email: fjragen@aol.com				
3					
4					
5	Attorney for Defendant WILLIAM HAMMAN				
6					
7	·				
8	UNITED STATES DISTRICT COURT				
9	SOUTHERN DISTRICT OF CALIFORNIA (Hon. Barry Ted Moskowitz)				
10	UNITED STATES OF AMERICA,) CASE NO. 08CR0440-BTM				
11	Plaintiff, NOTICE OF MOTIONS AND				
12	vs. MOTIONS TO:				
13	(1) COMPEL DISCOVERY; WILLIAM HAMMAN (3), (2) LEAVE TO FILE FURTHER				
14	Defendant.				
15 16	Date: March 28, 2008 Time:1:30 p.m.				
17	TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND				
18	SHERRI W. HOBSON, ASSISTANT UNITED STATES ATTORNEY:				
19	PLEASE TAKE NOTICE that on Friday, March 28, 2008, at 1:30 p.m., or as soon				
20	thereafter as counsel may be heard, the defendant, WILLIAM HAMMAN, by and through				
21	his counsel, Frank J. Ragen will ask this Court to issue an order granting the motions listed				
22	below.				
23	<u>MOTIONS</u>				
24	The defendant, WILLIAM HAMMAN, by and through his counsel, Frank J. Ragen,				
25	asks this Court pursuant to the Fifth and Sixth Amendments, to the United States				
26	Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes and local rules				
27	for an order to:				
28	1) Compel Discovery; 2) Leave to File Further Metions				
	2) Leave to File Further Motions.				
- 11	,				

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: March 6, 2008 s/Frank J. Ragen

FRANK J. RAGEN Attorney for Defendant WILLIAM HAMMAN Email: fjragen@aol.com

- 2 -

	Case 3:08-cr-00440-BTM	Document 35	Filed 03/06/2008	Page 3 of 3		
1	IIN	HTFD STATES	DISTRICT COURT	r		
2	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA					
3	(Hon. Barry Ted Moskowitz)					
4	UNITED STATES OF AM	IERICA)	CASE NO. 08CR044	0-BTM		
5	Plaintiff,	\	CERTIFICATE OF	SERVICE		
	vs.	<i>\</i>				
6	WILLIAM HAMMAN,)				
7 8	Defendant.	}				
9	IT IS HEREBY CERTIFIED THAT:					
10	I, LALANYA N. HAM, am a citizen of the United States and am at least eighteen					
11	years of age. My business address is 105 West F Street, Ste. 215, San Diego, California					
12	92101.					
13	I am not a party to the above-entitled action. I hereby certify that I have caused to be					
14	served NOTICE OF MOTIONS AND MOTIONS TO: (1) COMPEL DISCOVERY;					
15	(2) LEAVE TO FILE FURTHER MOTIONS to the following ECF participants on this					
16	case:					
17	Dorn G Bishop dorn@dornbishoplaw.com,kstarrj@yahoo.com					
18						
19	Lisa J Damiani					
20	ljdamiani@damianilawgroup.com,Comp1@damianilawgroup.com					
21	Patrick Q Hall hall@scmv.com,flor	es@scmv.com				
22	Sherri Walker Hobson					
23	Sherri.Hobson@usdoj.gov,melissa.d.johnson@usdoj.gov,efile.dkt.nes@usdoj.gov					
24	Leila W Morgan					
25	Leila_Morgan@fd.org,Angelica_Hernandez@fd.org					
26	I declare under penalty of perjury that the foregoing is true and correct.					
27	Executed on March 6, 2008.					
28		-, - · · · ·	Mataria	n. Han)		

LALANYA N. HAM